REMARKS

The indication of allowable subject matter in claims 14-16 is acknowledged and appreciated. In view of the following remarks, it is respectfully submitted that all claims are in condition for allowance.

Claims 7-11, 18 and 19 stand rejected under 35 U.S.C. § 112, second paragraph. Though traversed, the alleged indefinite portions have been removed so as to expedite prosecution. It is respectfully submitted that the claims, as amended, are definite. Accordingly, it is respectfully requested that the rejection of claims 7-11, 18 and 19 under § 112, second paragraph be withdrawn.

Claims 7, 9-13, 17 and 19 stand rejected under 35 U.S.C. § 102(b) as being anticipated by Mahmud 1, and claims 8, 18 stand rejected under 35 U.S.C. § 103 as being unpatentable over Mahmud 1 in view of Mahmud 2. Claims 7, 9, 12 and 17 are independent. These rejections are respectfully traversed for the following reasons.

Each of independent claims 7, 9, 12 and 17 embody a method of designing an interface using a database storing plural ***libraries*** corresponding to ***operation*** models of plural ***applications***. Accordingly, in order to analyze an interface, the present invention can simulate ***actual*** operation of a semiconductor integrated circuit. In contrast, Mahmud 1 is a technical paper directed merely to ***theoretical*** simulation. That is, Mahmud 1 does not disclose libraries for applications. Mahmud 1 uses only the ***possibility*** of a request for bus access, whereas the present invention can simulate actual operation of, for example, an LSI using libraries corresponding to operation models of plural applications. As summarized in Table 1 on page 124, Mahmud 1 merely describes analytical results which are mathematically-based and computer-generated simulation results which are

probability-based, as opposed to actual results which are based on real operation as can be performed in the present invention. Mahmud 1 is completely unrelated to, and does not enable, a real operational model in which operations are actually simulated using ***libraries***. Indeed, as noted on page 125, col. 2, lines 6-7, Mahmud 1 expressly states that "[t]his paper presents the ***preliminary*** model" (emphasis added) of a bus system.

New claim 20 is submitted to be allowable for reasons similar to those discussed above.

One exemplary embodiment of the present invention relates to a method of designing an interface of an LSI in which plural libraries can be prepared, each of which can contain information of one specified application of the plural applications and one specified bus structure of the LSI. Accordingly, actual simulation of the operation of the LSI for one specified application can be performed using the libraries. As discussed above, Mahmud 1 does not disclose nor enable actual operation, let alone for one specified application.

As anticipation under 35 U.S.C. § 102 requires that each and every element of the claim be disclosed in a single prior art reference, *Akzo N.V. v. U.S. Int'l Trade Commission*, 808 F.2d 1471 (Fed. Cir. 1986), based on the forgoing, it is submitted that Mahmud 1 does not anticipate claims 7, 9, 12, 17 and 20, nor any claims dependent thereon.

With respect to claims 8 and 18, as Mahmud 2 does not overcome the deficiencies of Mahmud 1, it is respectfully submitted that neither Mahmud 1 nor Mahmud 2, alone or in combination, disclose or suggest the claimed combination. The Examiner is directed to MPEP § 2143.03 under the section entitled "All Claim Limitations Must Be Taught or Suggested", which sets forth the applicable standard:

> To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. (citing *In re Royka*, 180 USPQ 580 (CCPA 1974)).

In the instant case, the pending rejection does not "establish *prima facie* obviousness of [the] claimed invention" as recited in claims 8 and 18 because the proposed combination fails the "all the claim limitations" standard required under § 103.

Under Federal Circuit guidelines, a dependent claim is nonobvious if the independent claim upon which it depends is allowable because all the limitations of the independent claim are contained in the dependent claims, *Hartness International Inc. v. Simplimatic Engineering Co.*, 819F.2d at 1100, 1108 (Fed. Cir. 1987). Accordingly, as claims 7, 9, 12, 17 and 20 are patentable for the reasons set forth above, it is respectfully submitted that all claims dependent thereon are also patentable. In addition, it is respectfully submitted that the dependent claims are patentable based on their own merits by adding novel and non-obvious features to the combination.

Based on all the foregoing, it is submitted that claims 7-26 are patentable over the cited prior art. Accordingly, it is respectfully requested that the rejections under 35 U.S.C. § 102/103 be withdrawn.

CONCLUSION

Having fully and completely responded to the Office Action, Applicant submits that all of the claims are now in condition for allowance, an indication of which is respectfully solicited. If there are any outstanding issues that might be resolved by an interview or an Examiner's amendment, the Examiner is requested to call Applicant's attorney at the telephone number shown below.

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To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 500417 and please credit any excess fees to such deposit account.

Respectfully submitted,

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